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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 RICHARD JACKSON, et al.,
12 Plaintiffs,
13 v.
14 TWITTER, INC., et al.
15 Defendants.

Case No. 2:22-CV-09438-AB (MAA)

**DECLARATION OF PAVEN
MALHOTRA IN SUPPORT OF
THE JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

Judge: Hon. Andre Birotte, Jr.

Complaint Filed: December 29, 2022

DECLARATION OF PAVEN MALHOTRA

I, Paven Malhotra, declare:

1. I am an attorney licensed to practice law in the State of California and am a partner Keker, Van Nest & Peters LLP, located at 633 Battery Street, San Francisco, California, 94111, counsel for Defendants Meta Platforms, Inc. and Instagram, LLC. in the above-captioned action.

2. This Court previously granted a joint stipulation [Dkt. 31] providing Defendants Meta Platforms, Inc., Instagram, LLC¹ (collectively “Meta”) Google LLC, Alphabet, Inc., YouTube LLC (collectively, “Google”),² Twitter, Inc., Amazon.com, Inc.,³ and the DNC Services Corporation (the “Moving Defendants”) until April 21, 2023 to file their responsive pleading to Plaintiffs’ complaint.

3. The National School Board Association (NSBA) is also a named defendant in Plaintiffs’ complaint and its responsive pleading deadline is currently April 26, 2023.

4. On April 6, 2023, I corresponded with Michael E. Reznick, counsel for Plaintiffs, and we agreed to extend the response deadline of Defendants Meta, Google, Twitter, Inc., Amazon.com, Inc., and the DNC Services to align with the responsive pleading deadline of the NSBA (April 26, 2023) to promote efficiency and for the convenience of the parties.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in San Francisco, California, on April 12, 2023.

/s/ Paven Malhotra
PAVEN MALHOTRA

¹ Instagram LLC is incorrectly identified in the Complaint as Instagram, Inc.

² YouTube LLC is incorrectly identified in the Complaint as Youtube, Inc.

³ Amazon.com, Inc. is incorrectly identified in the Complaint as Amazon, Inc.